

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MARY PHILLIPA SLEDGE, MARY
JANE PIDGEON SLEDGE TRUST, and
PIDGEON SLEDGE FAMILY LIMITED
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and
CLEAL WATTS, III,

Defendants.

**PLAINTIFFS' RESPONSE IN SUPPORT OF BAKER DONELSON'S MOTION FOR
HEARING, OR IN THE ALTERNATIVE, FOR SPECIFIC RELIEF**

Come now Mary Phillipa Sledge, Mary Jane Pidgeon Sledge Trust, and Pidgeon Sledge Family Limited Partnership ("Plaintiffs") and in response to the Motion for Hearing on Motion for Imposition of a Withdrawal Notice Period ("Motion", ECF No. 55) filed by Bruce McMullen, Lori Patterson, and Mary Wu of Baker, Donelson, Bearman, Caldwell & Berkowitz, PC ("Baker Donelson") would show unto the Court as follows:

Plaintiffs support Baker Donelson's Motion. In the alternative, Plaintiffs would consent to an Order granting Baker Donelson's withdrawal as long as such an Order requires Defendants Cleal Watts III and Indico System Resources, Inc. ("Defendants") to either retain substitute counsel, register for ECF or provide an address where service by ordinary U.S. Mail shall be deemed sufficient prior to Baker Donelson's withdrawal. Plaintiffs have consulted with Baker Donelson and Baker Donelson has agreed to these conditions. If this Court were to enter such an Order, Plaintiffs would also request that the Court extend the deadline to file Motions to Dismiss (currently set for

April 16, 2015) in the current scheduling order by thirty (30) days (to May 16, 2015), so that Defendants will have additional time to file such a motion, either *pro se* or with the benefit of new counsel.

Respectfully Submitted,

/s/ Darrell N. Phillips
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of April 2015, a copy of the foregoing electronically filed document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

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/s/ Darrell N. Phillips